

## EXHIBIT 1

# Deposition Transcript

Case Number: 2:23-CV-00179-JNW

Date: October 15, 2024

In the matter of:

MICHAEL WRIGHT AND ALEXIS WRIGHT v STATE FARM FIRE & CASUALTY

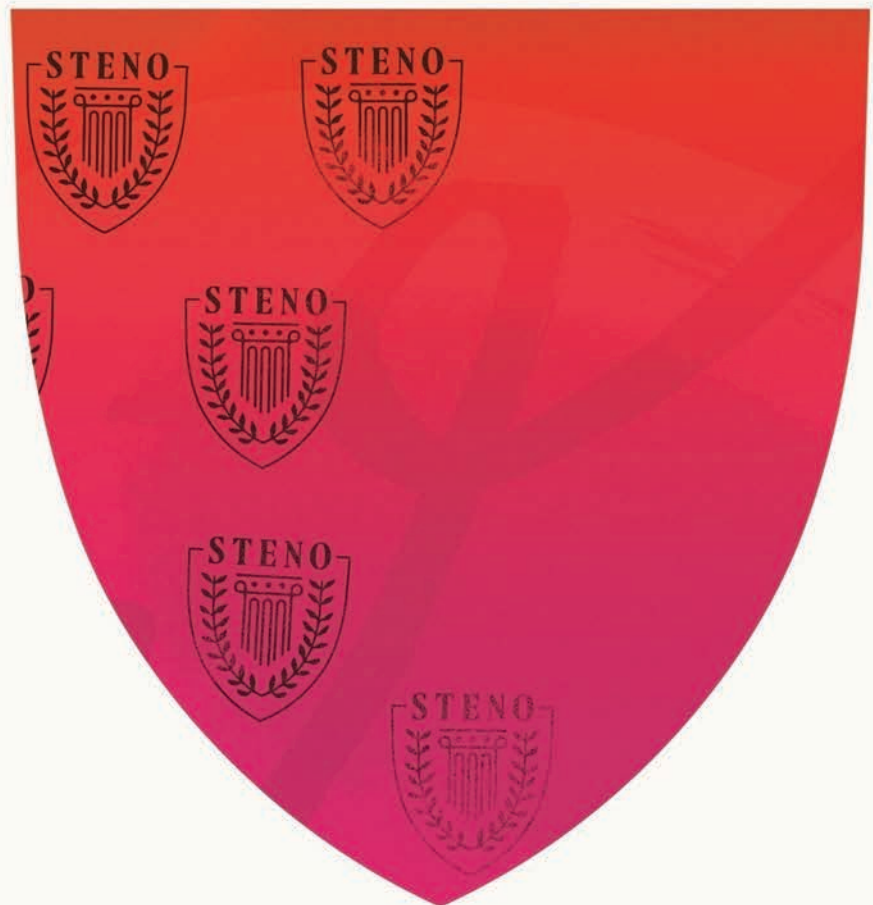
Christina Jalali 30(b)(6)

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CHRISTINA JALALI 30(B)(6)  
OCTOBER 15, 2024

JOB NO. 1194411

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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MICHAEL WRIGHT AND ALEXIS WRIGHT,  
a married couple,

Plaintiffs,

-vs-

Case No. 2:23-CV-00179-JNW

STATE FARM FIRE & CASUALTY  
COMPANY, a foreign insurer,

Defendant.

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REMOTE 30(b)(6) DEPOSITION OF CHRISTINA

JALALI, a witness in the above-entitled action, located  
in Kennewick, Washington, commencing at 9:30 a.m. PDT on  
the 15th day of October, 2024, before Lindsay DeWaide,  
Registered Merit Reporter, Certified Realtime Reporter,  
and Certified Shorthand Reporter No. 23015784 in and for  
the State of Washington.

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<p>1 REMOTE APPEARANCES: 2 FOR THE PLAINTIFFS: 3 CEDAR VIEW LAW, PLLC 4 BY: MS. HEATHER N. DERENSKI 5 108 Union Avenue 6 Snohomish, Washington 98290 7 425.460.0080 8 heather@cedarviewlaw.com 9 10 KARL E. MALLING, P.S. 11 BY: Karl E. Malling 12 1429 Avenue D, Suite 167 13 Snohomish, Washington 98290 14 206.629.5240 15 karl@mallinglaw.com 16 17 FOR THE DEFENDANT: 18 SINARS SLOWIKOWSKI TOMASKA LLC 19 BY: MR. JAMES D. HICKS 20 2815 Elliott Avenue, Suite 100 21 Seattle, Washington 98121 22 206.705.2115 23 jhicks@sinarslaw.com 24 25</p>	<p>1 INDEX 2 EXAMINATION 3 4 BY MS. DERENSKI 5 6 PLAINTIFF EXHIBITS 7 NUMBER PAGE IDENTIFIED 8 Exhibit 1 Amended Notice of Deposition 12 9 of State Farm Fire &amp; 10 Casualty Company Under Fed. 11 R. Civ. P. 30(b)(6) Designee 12 13 Exhibit 2 Claim File, Bates Nos. 38 14 09.10.2004_WRIGHT_SFCC_0000 15 01 - 006205 16 17 Exhibit 3 Email Correspondence, Bates 196 18 WRIGHTM00002827 - 2868 19 Exhibit 4 Email Correspondence, Bates 214 20 WRIGHTM00003661 - 3664 21 22 DEFENDANT EXHIBITS 23 NUMBER PAGE IDENTIFIED 24 Exhibit 1 10/9/24 Letter Re: Wright v. 15 25 State Farm (WAWD No. 2:23-cv-00179-JNW) State Farm's objections to plaintiff's FRCP 30(b)(6) notice</p>
Page 4	Page 5
<p>1 TRANSCRIPT OF PROCEEDINGS 2 THE COURT REPORTER: The attorneys 3 appearing in this deposition acknowledge that I am not 4 physically present in the deposition room, that I will 5 be reporting this deposition remotely, and that I will 6 administer the oath to the witness remotely. 7 If any party has an objection to this 8 manner of reporting or anything stated above, please 9 state so now. 10 MR. HICKS: No objection from State Farm. 11 THE COURT REPORTER: Hearing no objections, 12 we can proceed. 13 (Witness is sworn.) 14 MR. HICKS: All right. Before we begin, 15 I'd like to state an objection for the record, please. 16 MS. DERENSKI: Mr. Hicks, this is my 17 deposition. I'd like to proceed, please. 18 MR. HICKS: I'm just stating an objection 19 for the record. 20 My objection is that State Farm has 21 produced this witness, Ms. Jalali, for the purposes of 22 addressing topics No. 1, 2, 7, 8, 9, 13, and 14, and 23 has offered a second witness to appear on Thursday, 24 October 24th, for the remainder of the topics 25 identified in the plaintiffs' 30(b)(6) deposition</p>	<p>1 notice. 2 Thank you. 3 CHRISTINA JALALI, called as a witness 4 herein, having been first duly sworn on 5 oath, was examined and testified as 6 follows: 7 E X A M I N A T I O N 8 BY MS. DERENSKI: 9 Q. Good morning, Ms. Jalali. 10 A. Good morning. 11 Q. It's nice to see you again. 12 A. You too. 13 Q. I know it's been a while. 14 Would you state your full name for the record, 15 please. 16 A. Christina Jalali. 17 Q. Okay. And where are you today for your 18 deposition? 19 A. I'm in Kennewick, Washington. 20 Q. Okay. And what is your business address? 21 A. It is 212501 East Finley Road in Kennewick, 22 Washington 99337. That is where I'm physically 23 located. No mail comes to this address. It would all 24 go to the Illinois address. 25 Q. Okay. And is that your home?</p>

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<p style="text-align: right;">Page 258</p> <p>1 June 9, 2023, at 10:53 a.m. Central Time, Tim Treat 2 stated that he received an email from the 3 policyholder's attorney. They dispute the CRS version. 4 Then it goes down into Bates page 48, received 5 email outlining the disputes. And he noted that he 6 requested a copy of the lease from CRS. The insured is 7 responsible for the items in the house, not State Farm. 8 We are not a party to the lease. 9 So, yes, Tim did request. And I can't speak 10 for him. I do -- from my review of the file, he was 11 trying to assist in obtaining information to give to 12 you, to give to the insured so they better understood 13 because this was outside of the fire loss, it was 14 between CRS and the policyholder. 15 Q. Okay. So my question was a little bit 16 different. 17 So I just want to find out -- and we didn't 18 scroll all the way up into these file notes -- that if 19 State Farm ever received any evidence of any damages -- 20 and we talked about that there weren't photos that you 21 recall receiving of damage, but I'm just trying to see 22 if there was any other evidence that may have been 23 received regarding damage to this -- alleged damage to 24 this furniture rented by CRS. 25 MR. HICKS: That has been -- objection.</p>	<p style="text-align: right;">Page 259</p> <p>1 Asked and answered. It calls for a legal conclusion 2 regarding evidence. And this witness has already 3 answered that question, including identifying a phone 4 call. 5 Subject to those objections, Ms. Jalali, 6 you may answer the question. 7 THE WITNESS: Review of the file, I do not 8 see photos of the damage or an itemized statement of 9 the damages. And because this is between the insured 10 and CRS, I would not expect that we would have to have 11 those in the file. 12 We were not -- it was not part of the fire 13 loss. It was not needed to document the fire loss. It 14 was between the insured and CRS. And if the -- if 15 photos were requested, if the insured requested photos 16 or if the insured requested the itemization, that, 17 again, would go to CRS, and CRS would give that to the 18 insured or maybe you, if you requested it. I don't see 19 in the file note where we requested photos or an 20 itemization. 21 BY MS. DERENSKI: 22 Q. Okay. So the furniture that is the topic that 23 we were just discussing was rented on behalf of the 24 Wrights for their temporary housing; is that correct? 25 MR. HICKS: Objection to the extent that it</p>
<p style="text-align: right;">Page 260</p> <p>1 calls for a legal conclusion and misstates the evidence 2 in the record. 3 Go ahead, Ms. Jalali. 4 THE WITNESS: The policy owes for -- the 5 policy has coverage for the additional living expenses, 6 and CRS was billing State Farm for the increase in -- 7 the Wrights' increase in living expenses, which include 8 the temporary housing, included the fee. We were 9 paying the fee that they were being charged for the 10 furnishings. 11 But State Farm did not sign a lease or an 12 agreement to be responsible for those furnishings or 13 for the house. We were providing coverage under the 14 policy to pay for the increase in monthly expenses. 15 BY MS. DERENSKI: 16 Q. If I ask you questions regarding compensation 17 of Mr. Treat or any other State Farm employees involved 18 in this case, are you going to be able to answer that? 19 MR. HICKS: Well, I have an objection to 20 that, and the objection is that that calls -- if you're 21 asking for specific dollar amounts of compensation to 22 employees of State Farm, that that information is 23 private and confidential and not relevant or 24 proportional to the needs of this case. It is 25 therefore in violation of Rule 26 and the limitations</p>	<p style="text-align: right;">Page 261</p> <p>1 provided under that rule. 2 It is also subject to protection given 3 to -- in privacy and confidentiality. And because that 4 is protected information, I am going to direct my 5 client not to disclose any specific financial dollar 6 amounts of compensation to any people who work for 7 State Farm. 8 MS. DERENSKI: Okay. Counsel, your 9 objection is noted. You do not have a protective order 10 for this deposition today. 11 BY MS. DERENSKI: 12 Q. Ms. Jalali, would you be able to answer 13 questions related to any performance reviews related to 14 the employees involved in the case -- in the claim? 15 I'm sorry. 16 MR. HICKS: I have an objection to that, 17 and that is because that is outside of the topics for 18 which this witness was identified and designated to 19 respond to. We have offered up a witness on 20 October 24th who will be able to respond to those 21 topics. But this witness was not identified for that 22 purpose, so that's the objection there. 23 MS. DERENSKI: Are you directing the 24 witness not to answer? 25 MR. HICKS: No, I'm not on that one, but I</p>

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<p style="text-align: right;">Page 262</p> <p>1 am stating the objection.</p> <p>2 MS. DERENSKI: Okay.</p> <p>3 Madam Court Reporter, could you please read</p> <p>4 the question back for the witness?</p> <p>5 (Record read back as requested.)</p> <p>6 MR. HICKS: I'll reinvoke all the stated</p> <p>7 objections that I just did, and I will also add to that</p> <p>8 that the topic that does address this area of inquiry</p> <p>9 is Topic No. 4, "Criteria and process used to evaluate</p> <p>10 employee performance for the employees involved in the</p> <p>11 Wrights' claim." It goes on with other language.</p> <p>12 But like I stated, this witness has not</p> <p>13 been identified for the purpose of responding to that</p> <p>14 topic, and we have offered a witness for October 24th</p> <p>15 to respond to that topic.</p> <p>16 Subject to that objection, Ms. Jalali, you</p> <p>17 may answer if you can.</p> <p>18 <b>THE WITNESS: I have not been prepared to</b></p> <p>19 <b>discuss on that topic, so I do not have -- I'm not able</b></p> <p>20 <b>to discuss compensation.</b></p> <p>21 BY MS. DERENSKI:</p> <p>22 Q. Do you know how many other insurance bad faith</p> <p>23 lawsuits have been filed against State Farm for the</p> <p>24 state of Washington since 2021?</p> <p>25 MR. HICKS: Objection. That is the subject</p>	<p style="text-align: right;">Page 263</p> <p>1 of Topic No. 20, arguably No. 21, and 22. And this</p> <p>2 witness was not identified by State Farm to respond to</p> <p>3 those topics of inquiry.</p> <p>4 Subject to those objections, Ms. Jalali,</p> <p>5 you may answer.</p> <p>6 <b>THE WITNESS: I was not prepared to discuss</b></p> <p>7 <b>that topic. I do not have the answer to that question.</b></p> <p>8 BY MS. DERENSKI:</p> <p>9 Q. Do you know how many insurance commissioner</p> <p>10 complaints have been filed against or -- let me</p> <p>11 rephrase that.</p> <p>12 Do you know how many insurance commissioner</p> <p>13 complaints have been filed, including Mr. Treat, in the</p> <p>14 concerns alleged in the insurance commissioner</p> <p>15 complaint since 2021?</p> <p>16 MR. HICKS: Same exact objection to the</p> <p>17 last question.</p> <p>18 Subject to those objections, Ms. Jalali,</p> <p>19 you may answer.</p> <p>20 <b>THE WITNESS: I was not asked or prepared</b></p> <p>21 <b>to discuss that topic. I do not have an answer for</b></p> <p>22 <b>you.</b></p> <p>23 BY MS. DERENSKI:</p> <p>24 Q. If I ask you about State Farm's affirmative</p> <p>25 defenses in this case, will you be able to answer any</p>
<p style="text-align: right;">Page 264</p> <p>1 questions?</p> <p>2 MR. HICKS: That's also a topic that this</p> <p>3 witness was not identified to respond to. That</p> <p>4 particular topic is Topic No. 10.</p> <p>5 And, again, we've offered another witness</p> <p>6 to address that subject matter in Topic No. 10 on</p> <p>7 October 24th.</p> <p>8 MS. DERENSKI: Counsel, your objections are</p> <p>9 going on and on and on. You're just delaying this</p> <p>10 deposition.</p> <p>11 So, once again, I'll remind you that you</p> <p>12 picked this date for this deposition. You knew the --</p> <p>13 you knew the topics of the notice. And days ago, you</p> <p>14 suggested that this deposition be bifurcated, to which</p> <p>15 we did not agree, and we are not obligated to agree to.</p> <p>16 So I am entitled to ask the questions to</p> <p>17 the witness, and if the witness can't answer, the</p> <p>18 witness can say that they can't answer, but you cannot</p> <p>19 consistently object and continue to delay this</p> <p>20 deposition.</p> <p>21 If you have another objection, such as to</p> <p>22 form or privilege, you're welcome to make it.</p> <p>23 MR. HICKS: Well, I respectfully disagree</p> <p>24 with you and --</p> <p>25</p>	<p style="text-align: right;">Page 265</p> <p>1 BY MS. DERENSKI:</p> <p>2 Q. Ms. Jalali, are you able to --</p> <p>3 MR. HICKS: -- I'm going to --</p> <p>4 BY MS. DERENSKI:</p> <p>5 Q. -- answer any questions today --</p> <p>6 MR. HICKS: Let me continue with my</p> <p>7 objection, please, and my response.</p> <p>8 I respectfully disagree with you and what</p> <p>9 you just said. I believe that it is State Farm's right</p> <p>10 under the rules to designate more than one witness for</p> <p>11 a 30(b)(6) deposition, and that's exactly what we've</p> <p>12 done.</p> <p>13 And we gave notice of our concern on that</p> <p>14 and the explanation for why we thought that that was</p> <p>15 appropriate last Monday, on October the 7th, 2024.</p> <p>16 MS. DERENSKI: And since you brought that</p> <p>17 up for the record, your recommendation was so that we</p> <p>18 could review discovery that was due to us in August of</p> <p>19 2023 that has yet to be produced, but you continue to</p> <p>20 insist that it is -- and I will put this in air</p> <p>21 quotes -- imminently coming.</p> <p>22 Isn't that right?</p> <p>23 MR. HICKS: I'm not going to get into a</p> <p>24 back-and-forth with you. The record and the</p> <p>25 communications speak for themselves.</p>

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<p style="text-align: right;">Page 274</p> <p>1 for the three breaks that we've taken. 2 (Discussion held off the record.) 3 BY MS. DERENSKI: 4 Q. State Farm has a program called Total Rewards; 5 is that correct? 6 A. Yes. Total Rewards, yes, we have that. 7 Q. Okay. And what is that program? 8 A. The Total Rewards is a complete outline that 9 provides all the available benefits to an employee. It 10 can include retirement, 401(k), dental. It can include 11 resources for counseling, life source -- different 12 programs. 13 There are places to go to sign up for perks 14 throughout different companies that offer State Farm 15 employees discounts on items. It goes into financial 16 planning. There's resources. It provides a whole 17 umbrella of all the benefits that are available to an 18 employee. 19 Q. Okay. And State Farm has an incentive program; 20 is that correct? 21 MR. HICKS: Objection. This is outside the 22 scope of the topic for which this witness was 23 identified. Again, this is Topic No. 3 -- 24 MS. DERENSKI: Okay. Mr. Hicks, we are 25 running out of time, and I am entitled to ask these</p>	<p style="text-align: right;">Page 275</p> <p>1 questions. 2 So you've made your objection known. 3 Please -- I'm going to have to ask the court for 4 additional time just because of the number of lengthy 5 objections that are inappropriate. 6 BY MS. DERENSKI: 7 Q. So, Ms. Jalali, could you please answer the 8 question? 9 MR. HICKS: Well, I just want to state that 10 it's Topic No. 3 that you're -- that this line of 11 questioning -- 12 MS. DERENSKI: Thank you for confirming -- 13 MR. MALLING: You said that a hundred 14 times. 15 MS. DERENSKI: Thank you for confirming 16 that it falls squarely within my Exhibit A that I have 17 produced. 18 BY MS. DERENSKI: 19 Q. So, Ms. Jalali, I'm sorry. Can you -- 20 A. There is an enterprise incentive program, and 21 then there is a management incentive program. 22 Q. Okay. And what is involved in the enterprise 23 incentive program? 24 MR. HICKS: This is -- this is another 25 objection.</p>
<p style="text-align: right;">Page 276</p> <p>1 MR. MALLING: It doesn't matter. She can 2 answer the question if she knows. It doesn't matter 3 what the question is. 4 MS. DERENSKI: Mr. Hicks, yes, as 5 Mr. Malling just said, Ms. Jalali can answer the 6 question. Please stop objecting. You're running out 7 the clock intentionally. 8 BY MS. DERENSKI: 9 Q. I'm sorry, Ms. Jalali. Go ahead and continue. 10 MR. HICKS: I've stated my objection. It's 11 outside the scope of the topics that were assigned to 12 this witness. 13 Go ahead, Ms. Jalali. 14 THE WITNESS: I was not prepared to discuss 15 that topic. I wasn't asked to discuss that topic, but 16 I can -- 17 MR. MALLING: Doesn't matter. Does she 18 know. 19 THE WITNESS: I'm trying to answer. 20 BY MS. DERENSKI: 21 Q. Go ahead, Ms. Jalali. I'm sorry. Please 22 proceed. 23 A. Thank you. 24 I'm not being difficult. Can you just repeat 25 specifically what I was going to answer about the</p>	<p style="text-align: right;">Page 277</p> <p>1 incentive programs, the question, please? 2 Q. Yeah. So what does the -- I'm sorry. You 3 called it -- is it enterprise incentive program? 4 A. That's correct. The EIP is the enterprise. 5 Q. Yeah. So what does that entail? 6 A. Okay. I don't have the -- 7 MR. HICKS: I'm also going to object to 8 this to the extent that it is confidential information 9 and subject to a protective order. 10 Go ahead, Ms. Jalali. 11 THE WITNESS: What I can answer about that 12 in general, generally speaking of the program, I can 13 tell you that the incentive -- the enterprise incentive 14 program does not take into consideration claim 15 handling, claim amounts that are paid. It has nothing 16 to do with the claim handling. 17 It has to do with enterprise results when 18 we look at various different things within the company, 19 but it absolutely has nothing to do with claim 20 handling. 21 BY MS. DERENSKI: 22 Q. Okay. So does claim handling or an adjuster's 23 performance have any bearing on their annual review? 24 MR. HICKS: Objection. Outside the scope 25 of the topics that this witness was identified for.</p>



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1 Also compound.  
2 Go ahead, Ms. Derenski -- or, I'm sorry,  
3 Ms. Jalali, to the extent that you can.  
4 THE WITNESS: When we take a look at the  
5 performance, there are expectations not met,  
6 expectations met, or exceeding expectations. And those  
7 are based around how they perform their job. Not about  
8 indemnity, but are they staying in contact? Are they  
9 communicating? Are they providing the service to our  
10 insureds that we owe to the insured? Are they showing  
11 up for work on time?  
12 Those are the types of things that does  
13 play a part of the enterprise incentive program. It's  
14 not all of it. The employee can get half of the  
15 enterprise incentive. It varies.  
16 But from my understanding of the enterprise  
17 incentive program, again, it is not based on anything  
18 to do with specific claim handling, indemnity amounts.  
19 It's about the performance, the overall, of that claim  
20 associate, that employee, as well as different results  
21 that I cannot speak to because I was not prepared to do  
22 that of all these different results and measurements  
23 that come into that EIP, the enterprise incentive  
24 program, and how much that person gets. And it also  
25 depends on their salary. So there's a lot of different

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1 part of them or not.  
2 BY MS. DERENSKI:  
3 Q. So I'm not necessarily referring to Mr. Treat's  
4 employee file. I'm -- in general, as far as the  
5 enterprise incentive program goes, some of the  
6 documents we received that we reviewed mentioned that  
7 it was, from what I could gather, based on how the  
8 company performed overall, and then that set a  
9 percentage of some sort.  
10 And then there were various calculations, it  
11 looked like, based -- that would be applied to an  
12 individual's annual increase based, at least in part,  
13 on how the company performed.  
14 Could you help me better understand that, or do  
15 you understand the question? I'm sorry.  
16 MR. HICKS: Objection. Compound. Outside  
17 the scope of the topics that this witness was  
18 identified to respond to.  
19 Go ahead, Ms. Jalali.  
20 THE WITNESS: I will do my best to provide  
21 an answer to that. Again, I apologize. I was not  
22 prepared to discuss that topic or look over the  
23 documents for that.  
24 There are a lot of different metrics that  
25 go into that. When we take a look at the company's

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1 moving parts to that.  
2 Did I answer everything?  
3 BY MS. DERENSKI:  
4 Q. Okay. So does part of their annual review --  
5 is it based on company performance as well? And let me  
6 clarify what I mean by that.  
7 So as I understand some of the documents we  
8 received, that there is different metrics, and some of  
9 those metrics may involve the company's performance as  
10 well.  
11 So does the company's performance factor into  
12 the annual compensation increase or bonus that an  
13 adjuster or claim associate or employee may receive?  
14 MR. HICKS: Objection. Outside the scope  
15 of the topics this witness was identified for.  
16 Go ahead, Ms. Jalali.  
17 THE WITNESS: If we could bring up  
18 Tim Treat's file, and if you can point me to which  
19 specific metric report -- from my recollection of  
20 reviewing his file last night, the metrics were more  
21 about rating of meeting expectations, not meeting  
22 expectations, and it explains what those are.  
23 The -- so I would like to know specifically  
24 what -- the metrics that you're referring to because I  
25 don't know which metrics you're referring to to be a

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1 results -- and now, forgive me. There's the management  
2 incentive -- or enterprise incentive. But how many  
3 policies, auto policies, fire policies that were  
4 written, it's outside of the claim handling. But, like  
5 you mentioned, it is the company's -- how the company  
6 is doing as far as profit/loss ratio, how many policies  
7 we've gained, how many policies we've lost.  
8 Those are factors outside of the claim  
9 handler's control that does play into -- not all of it,  
10 but play into the part of the percentage available.  
11 And then it goes down to individual performance of how  
12 much of that percentage and where you fall in your  
13 salary.  
14 There's so many -- it's a very complicated  
15 process, and there's a lot of different things that go  
16 into it, and that -- I am not prepared to go into  
17 specific details.  
18 BY MS. DERENSKI:  
19 Q. Okay. So I just want to summarize to make sure  
20 I at least kind of understand, you know, what you're  
21 saying here, and please correct me if I -- if I make a  
22 mistake.  
23 So there are company objectives that -- or  
24 metrics that factor into an individual's annual review.  
25 And what that means is if the company has met certain



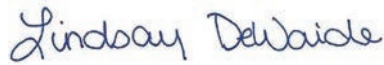
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<p style="text-align: right;">Page 282</p> <p>1 goals, then there's a percentage available for annual 2 increase. 3 And of that percentage, then it's -- so if 4 there's -- of that percentage, the employee's 5 individual performance would then -- or salary may 6 affect how much of that available percentage they're 7 entitled to. 8 Is that close or am I getting there? Can you 9 help me? 10 MR. HICKS: Objection. Compound, outside 11 the scope of the notice topics that this witness was 12 identified for, and misstates prior testimony, and 13 asked and answered. She just gave you the answer. 14 Subject to those objections, Ms. Jalali, go 15 ahead. 16 THE WITNESS: Trying to summarize this, and 17 I don't want to use any keywords or metrics that are 18 not on any documents that you've had, but it's the 19 company results -- at a high, high level, company 20 results, again, of how many policies gained, lost. 21 And there's calculations that go into that. 22 I can't talk specifically of those because I was not 23 prepared to give you very specific details of what goes 24 into that. It's not claim handling. It's not anything 25 to do with an indemnity paid per claim.</p>	<p style="text-align: right;">Page 283</p> <p>1 Then the profit/loss of the -- as a 2 corporation, how much money is available to divide -- 3 available for performance reviews. Performance 4 assessments. This is how much, you know, money. 5 And then according to that individual's 6 performance, depending on what level they are and what 7 they -- how they were rated, then they will get a 8 certain percent. And there's a whole long calculation 9 of how that is arrived at. 10 BY MS. DERENSKI: 11 Q. Okay. Thank you. 12 And you said depending on what level they are. 13 And Mr. Treat is what level? 14 A. So there's different levels. There's levels 15 when you are rating an employee at the end of the year 16 for their performance, and then there's levels of 17 claims adjusters. There's three different levels of 18 claims adjusters, and Tim Treat is a P6, which used to 19 be an RA3, RB3. 20 Q. Okay. And so that's a pretty high-level claim 21 adjuster; is that right? 22 MR. HICKS: Objection. Vague. 23 Go ahead, Ms. Jalali. 24 THE WITNESS: The P6, which used to be the 25 RA, RB3, is the highest level for a claims adjuster.</p>
<p style="text-align: right;">Page 284</p> <p>1 That's the highest level you can go. 2 BY MS. DERENSKI: 3 Q. Okay. Thank you for that. 4 And then you mentioned that there were other 5 levels that may apply. 6 Could you clarify what you meant by other 7 levels that may apply or impact the rating? 8 A. Yes. Depending on what year we look at, there 9 was a rating of one to three. One, you're not meeting 10 expectations; two, you're meeting expectations; three, 11 you exceeded them. 12 At present time, there are five different 13 levels, one being you are absolutely not meeting 14 expectations, and then five, you are going above and 15 beyond, which would include you are a mentor. You're 16 training. You are getting ready for that next level, 17 perhaps. So that's the one through five that is 18 currently used. 19 Q. Okay. Thank you for that. 20 And do you have any recollection of Mr. Treat's 21 2022 rating and compensation at the end of the year of 22 his -- let me rephrase that. 23 Do you have any recollection of how his 24 performance review went for 2022? 25 A. I would want to bring it up to review</p>	<p style="text-align: right;">Page 285</p> <p>1 completely, and that way I'm not mixing it up with my 2 own reviews that I've had of him. 3 Q. Okay. And so who would have performed his 4 performance review in 2022? 5 A. That's one of the reasons I'd want to bring up 6 the document. From my -- if I remember right, it would 7 be Necia Riddell. I'd have to see the document of who 8 completed what year. 9 I came in right at the -- at the end. I came 10 in December, but the review was already done, I 11 believe, by Necia Riddell, the team manager at that 12 time. 13 Q. Okay. And -- 14 MR. HICKS: All right. At this time, it's 15 5:18, and we're going to conclude the deposition at 16 this time. 17 MS. DERENSKI: Okay. Well, I'm going to 18 note for the record that we were not done with our 19 deposition, and we are going to reserve our right to 20 continue this deposition given the witness was not 21 prepared to speak on all of the topics and the lengthy 22 objections which ate up a considerable amount of time 23 today that were both unnecessary and inappropriate. 24 And is it your position, Mr. Hicks, that 25 you believe that we've exceeded seven hours of actual</p>

CHRISTINA JALALI 30(B)(6)  
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1 deposition testimony?	1 C E R T I F I C A T E
2 MR. HICKS: Yes. Yes.	2
3 THE COURT REPORTER: Will you be ordering a	3 I, Lindsay DeWaide, a Registered Merit
4 copy of this transcript?	4 Reporter, Certified Realtime Reporter, and Certified
5 MS. DERENSKI: We'll be ordering. Thank	5 Shorthand Reporter in and for the State of Washington,
6 you.	6 do hereby certify that the foregoing transcript of the
7 MR. HICKS: Yes. I will be ordering too.	7 deposition of Christina Jalali, having been duly sworn,
8 Electronic copy only with the exhibits, please. And in	8 on October 15, 2024, is true and accurate to the best of
9 the E-Tran.	9 my knowledge, skill, and ability.
10 MS. DERENSKI: PDF, with no exhibits,	10 I further certify that I am not a relative or
11 please.	11 employee or attorney or counsel of any of the parties,
12 (Remote deposition concluded at	12 or a relative or employee of such attorney or counsel,
13 5:20 p.m.)	13 or financially interested directly or indirectly in this
14	14 action.
15	15 IN WITNESS WHEREOF, I have hereunto subscribed
16	16 my name, this 21st day of October, 2024.
17	17
18	18 
19	19 LINDSAY DEWAIDE, RMR, CRR
20	20 CSR No. 23015784
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1	1 CHANGES AND SIGNATURE
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3	3 WITNESS NAME: CHRISTINA JALALI DATE: 10/15/2024
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5	5 PAGE/LINE CHANGE REASON
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